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Eldorado National Forest Supervisor's Office

100 Forni Road

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Attn: MAC Project

Re: Mokelumne Amador Calaveras Forest Health and Resilience Project Draft EIS

Sierra Pacific Industries (SPI) is a third generation, family-owned forest products company. The company is based in Anderson, CA, and consists of 14 sawmill locations as well as 2.4 million acres of actively managed timberlands in California, Oregon, and Washington. The Sonora division is the southernmost division and includes the Standard and Chinese Camp sawmills, which employ over 300 local workers as well as numerous contractors. Lincoln Division neighbors Sonora Division to the north. SPI has made significant investments to both the community and its facilities including the rebuilding of the Chinese Camp fencing mill in 2007, the Sonora grade mill in 2011, and the Lincoln small log mill in 2023.

Background

SPI appreciates the opportunity to comment on the MAC Draft Environmental Impact Statement (DEIS). The Stanislaus and Eldorado National Forests are direct contributors of forest products to our facilities, including our Lincoln division, and the health and productivity of all local timberlands support our facilities and communities. The Purpose and Need of the MAC project is stated to be the following:

"The MAC Project is necessary to:

- reduce the risk of wildfire to communities and their assets within and adjacent to USDA Forest Service-managed lands (4)
- increase forest resilience to natural disturbances and stressors, including large-scale wildfires, insect and disease, drought, and anticipated fluctuations in temperature and precipitation (5)
- improve and protect plant and wildlife habitat and biodiversity, including but not limited to conserving special-status species (6)
- improve and protect watershed integrity, water yield, and water resources, including water supply and water quality (7)
- reestablish fire processes and support the safe and effective use of fire management strategies (7)
- provide jobs and forest products from management activities (8)
- protect or enhance ecosystem services (9)."

SPI acknowledges and concurs with the above Purpose and Need for the MAC Project as set forth in the DEIS. We are pleased to see the Stanislaus and Eldorado National Forests making concerted efforts to increase the health and resiliency of our local landscapes.

Sierra Pacific Industries supports the implementation of Alternative 1 with modifications as listed below:

2.1A - Forest Thinning

The diameter limit as set provides more implications than solutions for the Purpose and Need set forth for the

MAC project. These arbitrary DBH limits set by the USFS decades ago were done so as a result of sociopolitical pressure and constructs; they have no silvicultural basis or backing. Furthermore, the silvicultural implications of the Forest Service's prohibition on removing large diameter trees is distinct, as decadent, broken-top, rotting trees are left in the stand simply because they are over the diameter limit.

When a lower quality, large diameter tree is left as a reserve tree, it actively takes away from the health of the stand (i.e., a large decadent White fir that will continue to produce shade-tolerant White fir trees that affect the regeneration of a healthy, heterogeneous stand.) Additionally, studies show that when pests and pathogens enter stands, they will target old, large diameter trees and kill them in groups, which increases the likelihood that said decadent reserve trees will contribute to an unhealthy stand.

We recommend that, if the diameter limit can/will not be removed, that a practical, unambiguous, silviculturally-backed exception be included for the purpose of ensuring that large diameter decadent trees be removed from stands when appropriate, and that healthy, vigorous trees be selected as reserve trees.

2.01E - Prescribed Fire

Of the 242,006 acres proposed to be treated with prescribed fire, 71% is proposed to be treated with initial entry burning (meaning prescribed fire will be introduced without any prior fuels treatment.) Per the MAC DEIS, "Due to the currently unsafe conditions and risk of extreme fire behavior, most of the MAC Project Area needs management action prior to prescribed fire being implemented at the scale needed to reach the desired condition" (8). This document describes stand conditions in initial entry acreage as having "vegetation...regrown to its pre-fire decadent state" (25). Introducing prescribed fire as initial treatment in dense stands with increased amounts of surface and ladder fuels increases the risks of longer flame lengths, higher intensity fire behavior, increased suppression difficulty, greater spotting potential, and increased risk of habitat loss and resource damage. Additionally, initial treatment with prescribed fire will have a higher cost for suppression.

To offset this, SPI recommends including salvage prescriptions for post-burn treatment in areas identified for initial entry burning. This will allow for timely removal of merchantable timber damaged during prescribed burning, and will provide financial return to help offset the higher suppression costs of initial entry burning.

2.22Ai - DBH Limit Exception for Safety Hazards

SPI has experience with attempting to implement removal of trees identified as "safety hazards" within cutting units on existing forest thinning projects, using a combination of R5 hazard tree guidelines and OSHA guidelines for danger trees, at the direction of the Forest Service. However, this process as it stands leaves much to interpretation by administrators on the ground who have differing opinions of what indicators of potential failure are and what a "safety hazard" actually is. This ambiguity risks leaving dead/dying trees that pose actual risk to operators working in these stands. SPI recommends a bolstering of this stipulation to provide for the safety of operators working around safety hazards.

2.22G - To Minimize Impacts to Terrestrial Wildlife

xix. No PAC Treatment in Areas Adjacent to Private Timberlands

The background of this statement is described under the cumulative impacts as being, "We assumed that private commercial lands would be clear cut over the next 10 years and adjusted the existing condition to reflect this as a loss of CSO habitat" (67). This is an uninformed assumption made without any attention or reference to the Habitat Conservation Plan (HCP) that SPI has in place with United States Fish and Wildlife. Our HCP allows for use of alternative prescriptions for even-aged management of up to twenty acres in size in concordance with the California Forest Practice Rules (CFPRs.) Sierra Pacific Industries' timber management is in accordance with all Federal and State requirements to protect CSO habitat on our timberlands. Furthermore, each HCP active CSO

site is afforded habitat protection under the plan.

The decision to not treat public lands based on an unfounded assumption that a clearcut potentially being implemented on neighboring timberland would destroy CSO habitat sets a dangerous precedence for future management on public timberlands.

By not allowing for "treatments" to occur within CSO PACs, a catastrophic wildland fire might bypass a fuelbreak via the PAC and continue on to destroy numerous additional PACs. We recommend that fuel reduction treatments be allowed if the PAC falls into a strategic location to prevent or hold the spread of a potential wildland fire. Recent published scientific literature supports fuelbreak in and around CSO sites.

McGinn, K., M. Z. Peery, J. J. Keane, K. Roberts, B. Dotters, S. A. Whitmore, W. J. Berigan, L. R. Gallagher, P. Shaklee, T. Munton, R. B. Hart*, R. J. Gutiérrez, G. M. Jones. The impacts of wildfire on spotted owls: a bioregional-scale data synthesis. Wildlife Monographs. In Press.

*Wright, M.E., Peery, M.Z., Ayars, J., Dotters, B.P., Roberts, K.N. and Jones, G.M., 2023. Fuels reduction can directly improve spotted owl foraging habitat in the Sierra Nevada. Forest Ecology and Management, 549, p.121430.

xxi. - CSO PAC Canopy Cover Pre/Post-Treatment

The DEIS states that "If a CSO PAC has an average canopy cover greater than 50 percent pre-treatment but anticipated to have an average canopy cover greater than 50 percent post-treatment, forest thinning should not occur unless the forest thinning is located within a fuelbreak or within the WUI defense zone." This is likely a typo. However, if it is not, this is a contradictory statement that has the potential to prevent the proposed and necessary treatment of PACs, and we recommend a revision that changes the language to "...average canopy cover less than 50 percent post-treatment."

2.2H - Species-Specific Tree Retention Requirements and Protections

SPI recommends implementing thinning prescriptions that include increased diameter limits surrounding special species. Other projects on the Stanislaus, including the SERAL project, allow for removal of conifers up to 40" DBH within 66 feet of Rust Resistant Sugar pines, within 66 feet of aspen stands, and within meadows. This prescription would open the stand and provide increased resources for special species like rust-resistant Sugar pine and Western white pine.

2.2K - To Minimize the Spread of Annosus Root Disease

SPI has extensive experience in facilitating the application of Sporax on Federal timber sales, and while we understand Sporax application is at regional direction, we recommend the removal of Sporax application from this DEIS. Traditionally, Sporax was available in granular form from Wilbur-Ellis and has been applied using the shaker method directly following mechanical operations. However, Wilbur-Ellis discontinued production of granular Sporax, which has made acquiring and applying Sporax much more difficult. Liquid sporax is difficult to acquire without a pest control business license, and is also more difficult to implement treatment, as it requires mixing dye and having staff transporting and applying the liquid within cutting units. Generally, handcutters and fire patrols apply Sporax - however, having to carry the equipment needed to apply Sporax in addition to equipment required to be transported by handcutters and fire patrol (saws, shovels, etc) is not practical.

3.1 - Issue Related to the Proposed Action

Issue 3 - The Proposed DBH limits may impact the Forests' ability to provide timber (wood product) to local and

regional communities and the likelihood of treatment implementation.

"...the DBH limits are unlikely to substantially constrain the Forests' ability to provide timber to local and regional communities."

SPI would like to give insight into how the 30" DBH limit does actually significantly affect existing industry infrastructure, and the ability of SPI to facilitate the purchasing of materials from Federal timber sales. As stated in the DEIS,

"The majority of merchantable material in treatment areas falls below the 30-inch threshold, meaning that local mills and biomass facilities would continue to receive a supply of small- and mid-diameter timber. Larger diameter trees, which are excluded under the limits, represent a relatively small proportion of the overall stand structure."

As has been communicated to the Stanislaus and Eldorado National Forests by SPI and other stakeholders, the lumber market for whitewood fencing, whitewood commons, and whitewood dimension has fallen significantly in recent years. When adjusted for inflation, this lumber market has hit lows consistent the 2008 recession. This affects the market value of timber being removed from the MAC project, particularly small whitewoods. As stated above, the majority of the timber being removed from the MAC project (in addition to timber being removed from existing projects on both Forests, thanks to Forest Service penchant for thinning-from-below) is heavy to small whitewood, for which there is little to no demand in the lumber market. Further saturation of the market with small whitewood is going to exacerbate industry's inability to afford pricing that helps facilitate the removal of timber.

Additionally, sawmills have specific needs when it comes to log species and sort - not all logs are the same. The Standard grade mill requires large logs (generally 15"+ small end diameter) while the Chinese Camp fencing mill and Lincoln small log mill generally require 14" small end diameter down to a 6" small end. With the continued implementation of the 30" DBH limit and focus on thinning-from-below prescriptions, there is a growing imbalance in large logs needed to supply the Standard grade mill and small logs able to be consumed by the Chinese Camp and Lincoln small log mills.

The MAC project asserts that "...even though the DBH constraints reduce potential harvest volumes, the results presented...demonstrate that wood products will still be provided." It is crucial for the Stanislaus and Eldorado National Forests to understand that the type of wood product being supplied does indeed affect the ability of local infrastructure to be able to assist in facilitating its removal. If a surplus of a type of wood product is being provided (in current markets this applies to small whitewoods, particularly small Pine), local infrastructure may not be able to receive all of it because of a decreased DMV. To state it plainly: the DBH limit has a direct and observable effect on the delivered market value of woods products being produced from the MAC project, and SPI strongly recommends that

However, if DBH limits were to increase above the arbitrary 30", or be removed altogether, and science-backed silviculture applied to the Forests' land management, larger timber with greater value would be removed in addition to smaller timber. This increase in value would lend itself to local infrastructure being able to facilitate removal and receipt of wood products from the MAC project, would supply large log mills, and would help to reach the goal of having a healthy and resilient Forest.

3.2 - Ability of the Proposed Action to Meet the Purpose and Need

Indicators and Measures - Basal Area

"To assess the Project's effectiveness at restoring ecosystem health and resilience, we compare how well the proposed treatments reduce basal area. We assume that if too great an area has basal areas remaining above

150 ft²/acre and 200 ft²/acre respectively, that the forest thinning treatment may not be sufficient to reduce the landscape's susceptibility to mortality from drought, bark beetle attacks and disease, and that the proposed DBH limits would be one factor impacting effectiveness.

Post-treatment modeled estimates of basal area are presented by dominant forest type as total acres less than or greater than 150 ft²/acre for pine and dry mixed conifer stands and less than or greater than 200 ft²/acre within fir and moist-mixed conifer stands at four scales: (1) All Lands; (2) CSO PAC; (3) CSO Territory; (4) Outside of CSO PAC and Territory."

SPI has extensive experience in administering and executing thinning products on Federal timberlands, and has observed the effects that prescribed basal area targets have on public timberlands. Often, stands are above 200sqft/acre of basal area pre-entry, and target residual basal areas range from 140-170sqft/acre. Target basal areas above 100sqft are not effective in thinning stands for health and resilience. The CFPRs assert that a residual basal area of 50-100sqft (depending on site class) is most effective in timberland management. SPI recommends target residual basal areas within these parameters for thinning treatments.

Closing Remarks

We commend the efforts by the United States Forest Service, specifically the Stanislaus and Eldorado National Forests, on the MAC project and believe that, if its resources and intent are fully realized and implemented, it will be a momentous improvement on the health and resilience of our local forests. As previously stated, we fully support Alternative 1 as written within the MAC DEIS, with consideration of the modifications recommended in this letter. Sierra Pacific Industries appreciates the opportunity to comment and collaborate on this project.

Sincerely,

Hannah Grabowski
Procurement Forester -- Sonora Division
Sierra Pacific Industries